



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION I
5 POST OFFICE SQUARE, SUITE 100
BOSTON, MA 02109-3912

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

OCT 24 2011

Jorge J. Garcia
Director of Facilities
for the City of Bridgeport Board of Education
Office of School Construction Services
999 Broad Street
Bridgeport, Connecticut 06604

Re: PCB Cleanup and Disposal Approval under 40 CFR §§ 761.61(a) and (c),
and § 761.79(h)
Roosevelt School
680 Park Avenue
Bridgeport, Connecticut

Dear Mr. Garcia:

This is in response to the Bridgeport Board of Education (BBE) Notification¹ for approval to clean up and dispose of PCB-contaminated building materials located in the building known as the Roosevelt School (the Site) located at 680 Park Avenue, Bridgeport, Connecticut. The Site contains PCB caulk that exceeds the allowable PCB levels under the federal PCB regulations at 40 CFR § 761.20(a) and § 761.62.

In its Notification, BBE has proposed the following PCB cleanup and disposal plan:

- Remove and dispose of the following wastes as a greater than or equal to (\geq) 50 parts per million (ppm) PCB waste in a TSCA-approved or RCRA hazardous waste landfill:
 - PCB caulk on the exterior of the building (i.e., window and door jamb openings, expansion joints, vent covers, and the vertical edge of chimney)

¹ The Notification was prepared by Hygenix, Inc. on behalf of the Bridgeport Board of Education to satisfy the notification requirement under 40 CFR § 761.61(a)(3). Information was submitted dated May 6, 2011 (Self-Implementing On-Site Cleanup and Disposal Plan (SIDP)) and October 4, 2011 (Response to Comments). These submittals shall be referred to as the "Notification".

- *Non-porous surfaces* (i.e., metal window and door assemblies, and vent covers, and steel lintels in contact with PCB caulk) on the exterior of the building
- *Porous surfaces:*
 - Brick and concrete to a distance 3 inches from the PCB caulk joints on the exterior of the building;
 - Brick to a distance 6 inches from the chimney joints;
 - Interior cinder blocks to a distance 6 inches from the window frames; and,
 - Interior window sills in their entirety.

Remove and dispose of the following wastes with PCB concentrations greater than (>) 1 ppm but less than (<) 50 ppm at a state permitted disposal landfill in accordance with § 761.61(a)(5)(i)(B)(2)(ii):

- PCB caulk on the interior of the building (i.e., interior classroom door, classroom corners) and along the roof flashing, and black caulk from sidewalks in the vicinity of the cafeteria
- *Porous surfaces:*
 - Cinder block to a distance of 1 inch from the PCB caulk joints on the interior corners of the classrooms;
 - Cinder block to a distance of 3 inches of from the interior window and door assemblies; and,
 - Concrete sidewalk to a distance of 3 inches of along the PCB caulk joint.
- *Porous surfaces* (i.e., asphalt) to a distance of 4 feet from the foundation wall
- *Non-porous surfaces* on the interior of the building (i.e., metal window and door assemblies in contact with PCB caulk < 50 ppm and radiator covers) and on the exterior of the building (i.e., metal roof flashing)

With the exception of the proposed verification sampling frequency for *porous surfaces* (i.e., brick, cinder block, and concrete) the Notification meets the requirements and standards established under §§ 761.61(a), 761.62, and 761.79 for cleanup and disposal of *PCB remediation waste* and *PCB bulk product waste*.

With respect to the verification sampling frequency, based on the results of the PCB sampling to-date and the proposed cleanup and disposal approach, it appears that the proposed plan should be adequate to remove all PCB contamination with > 1 ppm. As such, EPA has determined that it is reasonable to allow an alternative to the Subpart O verification sampling frequency requirement under § 761.61(a)(6). EPA finds that the alternative sampling proposed by BBE will not create an unreasonable risk to public health or the environment. EPA may approve the alternative sampling under § 761.61(c).

Based on EPA's review, the information provided in the Notification meets the requirements under 40 CFR §§ 761.61, 761.62, and 761.79(h) for removal and disposal of *PCB bulk product wastes* and for cleanup and disposal of *PCB remediation wastes*. Further, the proposed activities are consistent with the requirements and standards established under § 761.61(a), § 761.62, and § 761.79.

BBE may proceed with its cleanup in accordance with 40 CFR §§ 761.61(a) and (c); § 761.62; § 761.79(h); its Notification; and this Approval, subject to the conditions of Attachment 1.

Questions and correspondence regarding this Approval should be directed to:

Kimberly N. Tisa, PCB Coordinator
United States Environmental Protection Agency
5 Post Office Square, Suite 100
Mail Code: OSRR07-2
Boston, Massachusetts 02109-3912
Telephone: (617) 918-1527
Facsimile: (617) 918-0527

This Approval does not release BBE from any applicable requirements of federal, state or local law, including the requirements related to cleanup and disposal of PCBs or other contaminants under the Connecticut Department of Energy and Environmental Protection (CT DEEP) regulations.

EPA shall not consider this project complete until it has received all submittals required under this Approval. Please be aware that upon EPA receipt and review of the submittals, EPA may request any additional information necessary to establish that the work has been completed in accordance with 40 CFR Part 761, the Notification, and this Approval.

Sincerely,



James T. Owens III, Director
Office of Site Remediation & Restoration

cc: James Twitchell, Hygenix, Inc
Gary Trombly, CTDEEP
File

Attachment 1- Approval Conditions

ATTACHMENT 1

**PCB CLEANUP AND DISPOSAL APPROVAL CONDITIONS
ROOSEVELT SCHOOL ("the Site")
680 PARK AVENUE, BRIDGEPORT, CONNECTICUT**

GENERAL CONDITIONS

1. This Approval is granted under the authority of Section 6(e) of the Toxic Substances Control Act (TSCA), 15 U.S.C. § 2605(e), and the PCB regulations at 40 CFR Part 761, and applies solely to the *PCB bulk product waste* and the *PCB remediation waste* located at the Site and identified in the Notification.
2. The Bridgeport Board of Education (BBE) shall conduct on-site activities in accordance with the conditions of this Approval and with the Notification.
3. In the event that the cleanup plan described in the Notification differs from the conditions specified in this Approval, the conditions of this Approval shall govern.
4. The terms and abbreviations used herein shall have the meanings as defined in 40 CFR § 761.3 unless otherwise defined within this Approval.
5. BBE must comply with all applicable federal, state and local regulations in the storage, handling, and disposal of all PCB wastes, including PCBs, PCB Items and decontamination wastes generated under this Approval. In the event of a new spill during response actions, BBE shall contact EPA within 24 hours for direction on PCB cleanup and sampling requirements.
6. BBE is responsible for the actions of all officers, employees, agents, contractors, subcontractors, and others who are involved in activities conducted under this Approval. If at any time BBE has or receives information indicating that BBE or any other person has failed, or may have failed, to comply with any provision of this Approval, it must report the information to EPA in writing within 24 hours of having or receiving the information.
7. This Approval does not constitute a determination by EPA that the transporters or disposal facilities selected by BBE are authorized to conduct the activities set forth in the Notification. BBE is responsible for ensuring that its selected transporters and disposal facilities are authorized to conduct these activities in accordance with all applicable federal, state and local statutes and regulations.
8. This Approval does not: 1) waive or compromise EPA's enforcement and regulatory authority; 2) release BBE from compliance with any applicable requirements of federal, state or local law; or 3) release BBE from liability for, or otherwise resolve, any violations of federal, state or local law.

NOTIFICATION AND CERTIFICATION CONDITIONS

9. This Approval may be revoked if the EPA does not receive written notification from BBE of its acceptance of the conditions of this Approval within 10 business days of receipt.
10. BBE shall submit the following information for EPA review and/or approval:
 - a. a certification signed by its selected contractor, stating that the contractor(s) has read and understands the Notification, and agrees to abide by the conditions specified in this Approval;
 - b. a contractor work plan, prepared and submitted by the selected demolition or abatement contractor(s) describing the containment and air monitoring that will be employed during abatement activities. This work plan should also include information on how and where wastes will be stored and disposed of, and on how field equipment will be decontaminated; and,
 - c. a certification signed by the selected analytical laboratory, stating that the laboratory has read and understands the extraction and analytical methods and quality assurance requirements specified in the Notification and in this Approval.

REMEDIAL AND DISPOSAL CONDITIONS

11. To the maximum extent practical, engineering controls, such as barriers, and removal techniques, such as the use of HEPA ventilated tools, shall be utilized during removal processes. In addition, to the maximum extent possible, disposable equipment and materials, including PPE, will be used to reduce the amount of decontamination necessary.
12. PCB-contaminated materials shall be decontaminated and confirmatory sampling and analysis shall be conducted as described below:
 - a. All visible residues of PCB caulk (i.e. *PCB bulk product waste*) shall be removed as described in the Notification.
 - b. The cleanup level for *PCB remediation waste* (e.g., concrete, brick, and asphalt) at the Site shall be less than or equal to (\leq) 1 part per million (ppm) for unrestricted use or disposal.

- i) Sampling for *porous surfaces* shall be performed on a bulk basis (i.e., mg/kg) and reported on a dry weight analysis. Sampling for *porous surfaces* shall be conducted in accordance with the EPA Region 1 *Standard Operating Procedure for Sampling Porous Surfaces for Polychlorinated Biphenyls (PCBs) Revision 4, May 5, 2011*, at a maximum depth interval of 0.5 inches and at the frequency specified in the Notification.
 - ii) In the event that any verification sample contains a PCB concentration greater than (>) 1 ppm, BBE shall contact EPA for further discussion and direction on cleanup and/or sampling requirements.
 - c. Chemical extraction for PCBs shall be conducted using Methods 3500B/3540C of SW-846 for solid matrices and Method 3500B/3510C of SW-846 for aqueous matrices; and, chemical analysis for PCBs shall be conducted using Method 8082 of SW-846, unless another extraction or analytical method(s) is validated according to Subpart Q
13. All PCB waste (regardless of concentration) generated as a result of the activities described in the Notification, excluding any decontaminated materials, shall be marked in accordance with § 761.40; stored in a manner prescribed in § 761.65; and, disposed of in accordance with 40 CFR § 761.61(a)(5) or § 761.62, unless otherwise specified below:
- a. Decontamination wastes and residues shall be disposed of in accordance with 40 CFR § 761.79(g).
 - b. Moveable equipment, tools, and sampling equipment shall be decontaminated in accordance with either 40 CFR § 761.79(b)(3)(i)(A), § 761.79(b)(3)(ii)(A), or § 761.79(c)(2).
 - c. PCB-contaminated water generated during decontamination shall be decontaminated in accordance with 40 CFR § 761.79(b)(1) or disposed of under § 761.60.

INSPECTION, MODIFICATION AND REVOCATION CONDITIONS

14. BBE shall allow any authorized representative of the Administrator of the EPA to inspect the Site and to inspect records and take samples as may be necessary to determine compliance with the PCB regulations and this Approval. Any refusal by BBE to allow such an inspection (as authorized by Section 11 of TSCA) shall be grounds for revocation of this Approval.

15. Any proposed modification(s) in the plan, specifications, or information in the Notification must be submitted to EPA no less than 14 calendar days prior to the proposed implementation of the change. Such proposed modifications will be subject to the procedures of 40 CFR § 761.61(a)(3)(ii).
16. Any departure from the conditions of this Approval without prior, written authorization from the EPA may result in the revocation, suspension and/or modification of the Approval, in addition to any other legal or equitable relief or remedy the EPA may choose to pursue.
17. Any misrepresentation or omission of any material fact in the Notification or in any records or reports may result in the EPA's revocation, suspension and/or modification of the Approval, in addition to any other legal or equitable relief or remedy the EPA may choose to pursue.

RECORDKEEPING AND REPORTING CONDITIONS

18. BBE shall prepare and maintain all records and documents required by 40 CFR Part 761, including but not limited to the records required under Subparts J and K. A written record of the decontamination and the analytical sampling shall be established and maintained by BBE in one centralized location, until such time as EPA approves in writing a request for an alternative disposition of such records. All records shall be made available for inspection to authorized representatives of EPA.
19. BBE shall submit a final report to the EPA within 60 days of completion of the activities authorized under this Approval. At a minimum, this final report shall include: a short narrative of the project activities; characterization and confirmation sampling analytical results; copies of the accompanying analytical chains of custody; field and laboratory quality control/quality assurance checks; an estimate of the quantity of PCB waste disposed of and the size of the decontaminated area(s); copies of manifests and bills of lading; and, copies of certificates of disposal or similar certifications issued by the disposer.
20. Required submittals shall be mailed to:

Kimberly N. Tisa, PCB Coordinator (OSRR07-2)
United States Environmental Protection Agency
5 Post Office Square, Suite 100
Boston, Massachusetts 02109-3912
Telephone: (617) 918-1527
Facsimile: (617) 918-0527

21. No record, report or communication required under this Approval shall qualify as a self-audit or voluntary disclosure under EPA audit, self-disclosure or penalty policies.

END OF ATTACHMENT 1